

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

ALIANZA AMERICAS, YANET DOE, PABLO DOE, and
JESUS DOE, on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of Florida, in his official
and personal capacities; JARED W. PERDUE, Secretary of
the Florida Department of Transportation, in his official and
personal capacities; LAWRENCE A. KEEFE, Florida Public
Safety Czar, in his official and personal capacities; JAMES
UTHMEIER, Chief of Staff to Florida Governor, in his
official and personal capacities; STATE OF FLORIDA; THE
FLORIDA DEPARTMENT OF TRANSPORTATION;
JAMES MONTGOMERIE; PERLA HUERTA; and
VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No. 1:22-cv-11550-ADB

REQUEST FOR ORAL ARGUMENT

**DEFENDANTS' JOINT MOTION TO TRANSFER
TO THE NORTHERN DISTRICT OF FLORIDA**

Defendants jointly move this Court to transfer venue to the United States District Court for the Northern District of Florida pursuant to 28 U.S.C. §1404(a). In support thereof, Defendants rely upon the accompanying Memorandum of Law. Defendants have separately filed motions to dismiss Plaintiffs' First Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1), (2), (3), and (6), demonstrating that the District of Massachusetts is an improper venue and that this Court lacks jurisdiction over the claims and Defendants. Even if this Court were to conclude otherwise, it should nevertheless transfer this civil action to the Northern District of Florida for the reasons stated in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court grant their motion to transfer venue to the Northern District of Florida.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), State Defendants respectfully request oral argument for this motion. Defendants believe that oral argument may assist the court.

Dated: February 28, 2023

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

In accordance with Local Rule 7.1(a)(2), I hereby certify that counsel for State Defendants conferred and attempted in good faith to resolve or narrow the issues set forth in this motion with Plaintiffs' counsel via e-mail on February 27, 2023, and Plaintiffs' counsel opposed this motion.

Dated: February 28, 2023

s/ Bryan Weir

CERTIFICATE OF SERVICE

I hereby certify that I filed this document through the Court's ECF system on February 28, 2023, which will therefore automatically be sent electronically to all counsel of record via the CM/ECF system.

Dated: February 28, 2023

s/ Bryan Weir